

ESTTA Tracking number: **ESTTA634676**

Filing date: **10/23/2014**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91213584
Party	Plaintiff Jaguar Land Rover Limited
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Submission	Reply in Support of Motion
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Date	10/23/2014
Attachments	91213584 Reply.pdf(640023 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

JAGUAR LAND ROVER LIMITED,)	Opposition No. 91213584
)	
Opposer,)	
)	Serial No. 85867803
v.)	
)	
TOYS TEKK CORPORATION,)	
)	
)	
Applicant.)	

**OPPOSER’S REPLY TO
APPLICANT’S NON-OPPOSITION TO MOTION TO EXTEND DISCOVERY
AND TRIAL DATES AND OPPOSITION TO MOTION TO COMPEL**

Opposer Jaguar Land Rover Limited submits this Reply to Applicant Toys Tekk Corporation’s Non-Opposition To Motion To Extend Discovery And Trial Dates And Opposition To Motion To Compel (“Response”), and states as follows:

1. Applicant Consents To Motion To Extend Discovery And Trial Dates

In its Response, Applicant consents to and offers to stipulate to Opposer’s Motion to Extend Discovery and Trial Dates (“Motion to Extend”). Accordingly, Opposer respectfully requests that its Motion to Extend be granted.

2. There is No Legitimate Basis to Defer Ruling On Motion To Compel

In its Response, Applicant requests a deferred ruling on Opposer’s Motion to Compel. Opposer opposes a deferred ruling on its Motion to Compel. Applicant does not deny the relevance of Opposer’s requests and has offered no legitimate reason for its objections and for its delay in providing full responses and producing documents. In fact, Applicant states in its

Response that "Applicant believes the most viable method to resolve the dispute is ... to withdraw certain objections, to supplement its responses, and to produce pertinent documents." Applicant should be compelled to take that action with respect to *all* of the outstanding discovery requests, without being afforded an opportunity to pick and choose to which of Opposer's requests it will provide responses.

WHEREFORE, Opposer respectfully requests that the Board grant its Motion to Compel Applicant's responses to the interrogatory and document requests identified in its Motion and Memorandum. And Opposer requests that the Board grant the now consented-to Motion for an extension of the discovery and trial dates by sixty (60) days.

Respectfully submitted,

By:



Chanille Carswell
Jennifer K. Ziegler

Attorneys/Agents for Jaguar Land Rover Limited

Date: October 23, 2014

BROOKS KUSHMAN P.C.
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CERTIFICATE OF SERVICE

I certify that I served:

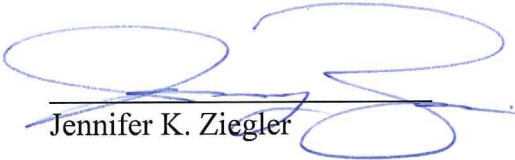
**OPPOSER'S REPLY TO
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on October 23, 2014 by First Class Mail to:

Shun C. Chen
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Courtesy copy via email to: *shunchen@att.net*

Correspondent for Applicant



Jennifer K. Ziegler